

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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TODD OKIMOTO, Derivatively and On
Behalf of Nominal Defendant LONGWEI
PETROLEUM INVESTMENT HOLDING
LIMITED

Plaintiff,

Case No. 13cv04494 (HB)

v.

YOUNGJUN CAI, JAMES CRANE,
MICHAEL TOUPS, YONGPING XUE,
DOUGLAS COLE, GERALD DECICCIO,
DORA DONG, and XIAOPING XUE,

Defendants,

LONGWEI PETROLEUM INVESTMENT
HOLDING LIMITED, a Colorado
Corporation,

Nominal Defendant.

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**JOINT STIPULATION AND PROPOSED ORDER TO STAY PROCEEDING
PENDING SERVICE OF ALL DEFENDANTS**

WHEREAS, Plaintiff Todd Okimoto ("Plaintiff") filed the above-captioned action as a verified shareholder's derivative suit on behalf of Nominal Defendant Longwei Petroleum Investment Holding Limited ("Longwei"); and

WHEREAS, Plaintiff has not been able to ascertain the whereabouts of all defendants in this action and, therefore, has not been able to serve all Defendants in this action;

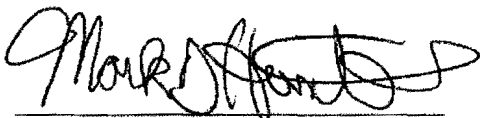
IT IS HEREBY STIPULATED AND AGREED among the undersigned parties that: (1) Douglas Cole ("Mr. Cole") hereby accepts service of the summons and complaint; (2) the matter be stayed as to Mr. Cole, pending service of the remaining defendants in this matter, or to a time that this Court deems just and proper; and (3) by

entering into this stipulation, Mr. Cole does not intend to waive and does not waive any rights or defenses otherwise available or that may become available in the course of the above captioned action.

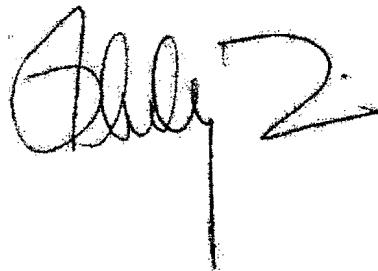
DATED: September 9, 2013
Coral Gables, Florida

HUNTER TAUBMAN WEISS LLP
By:

THE ROSEN LAW FIRM, P.A.
By:

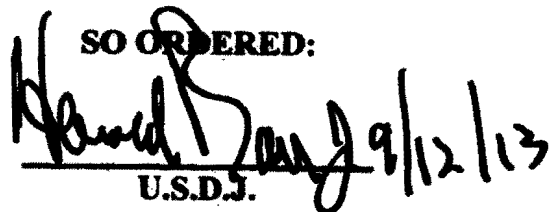


Mark David Hunter, Esq.
Jenny D. Johnson-Sardella, Esq.
255 University Drive
Coral Gables, Florida 33134
T: (305) 629-8816 F: (305) 629-8877
Email: mdhunter@htwlaw.com
Email: jsardella@htwlaw.com
Attorneys for Defendant
Douglas Cole



Phillip Kim, Esq.
Laurence M. Rosen, Esq.
275 Madison Avenue, 34th Floor
New York, New York 10016
T: (212) 686-1060 F: (212) 202-3827
Email: pkim@rosenlegal.com
Email: lrosen@rosenlegal.com
Attorneys for Plaintiffs

SO ORDERED:



U.S.D.J.

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